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June 30, 2022

VIA ECF

The Honorable Ronnie Abrams
United States District Judge Southern District of New York
Thurgood Marshall, United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Billy Ortega, et al 22 Cr. 91 (RA)*

Dear Judge Abrams:

I represent William Drayton in the above referenced Indictment and write jointly on behalf of all the defendants and with the consent of the government to request that the Court's motion schedule be extended. Trial in this case is scheduled for November 28, 2022, and motions are due by July 5, 2022. See ECF filing on May 3, 2022. For the reasons set forth below we respectfully request that motions be filed on or before August 16, 2022; the responses filed by August 30, 2022; and replies filed by September 6, 2022.

We make this request as the parties are actively engaged in plea negotiations and as it specifically relates to defendant Drayton are hopeful a resolution is at hand. Furthermore, the volume of discovery is extensive, and all defense counsel need more time review the discovery and meet with our incarcerated clients at the MDC jail (which has been in various states of lockdown, making attorney visits extraordinarily difficult). This additional time will allow parties to meet and confer with the government to explore possible resolutions, and to winnow and clarify the pre-trial issues in dispute.

I have discussed this extension request with counsel for the two codefendants, who join in it, and with counsel for the government who consent to it. All defendants further consent to the exclusion of time pursuant to the Speedy Trial Act.

Sincerely,
Christopher Wright
Christopher Wright

Cc: all counsel of record (via ECF)